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VIA ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW, Room TW-A325 Washington, DC 20554

Re: Petitions of AT&T Inc. and National Telecommunications Cooperative Association to Launch A Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353

Dear Ms. Dortch:

TechAmerica is the leading voice for the U.S. technology industry, which is the driving force behind productivity growth and jobs creation in the United States and the foundation for the global innovation economy. Representing approximately 1,000 member companies of all sizes from the public and commercial sectors of the economy, TechAmerica is the industry's largest advocacy organization. TechAmerica's members include: manufacturers and suppliers of broadband networks and equipment; consumer electronics companies; ICT hardware companies; software and application providers; systems integrators; Internet and e-commerce companies; Internet service providers; information technology government contractors; and information technology consulting and sourcing companies.

TechAmerica applauds the Federal Communications Commission's (Commission) decision to expeditiously launch a proceeding in response to the recent petitions filed by AT&T and the National Telecommunications Cooperative Association (NTCA). To be sure, the arguments contained in each petition are important ones and worthy of imminent review.

TechAmerica would like to take this opportunity to offer its support for the notions contained especially within AT&T's petition. Indeed, as the Commission well knows, the transition in the marketplace from TDM architecture to state-of-the-art IP-based networks is well underway. And the innovation arising from such a transition is astounding. Whether it be in e-health, distance education, or cloud computing, to name a few areas, IP-enabled services have facilitated rapid technological changes that have directly impacted lives for the better.

Advanced next generation, high-speed IP-enabled networks and services are revolutionizing the high-tech and communications sectors. The American consumer is no longer limited to voice-only communications or choosing multiple providers for different services. The technological convergence of service platforms now enables consumers to receive all of their communications and video services from one provider. However, absent regulatory change, further evolution in IP-enabled services will be hindered. It is therefore imperative that the Commission provide the necessary regulatory glide path to ensuring further innovation and network investment.

AT&T's suggestion that the Commission proactively work with industry to initiate several geographically limited beta-tests as a trial run for the shift away from TDM networks and toward nationwide deployment of IP-based networks is a sound one. The high-tech and communications sectors routinely use beta tests to roll out innovative technology to consumers. Having had experience doing such beta tests a few years ago during the DTV transition, the Commission is well-positioned to engage in the necessary testing.

TechAmerica further agrees with AT&T that policymakers, especially the Commission, should create a 21st century regulatory framework that identifies and addresses consumer protections in the digital IP age, such as ensuring public safety and promoting access to new technologies to underserved and unserved areas. In this vein, TechAmerica thanks the Commission for its recent decision to create a Technology Transitions Policy Task Force to help facilitate a dialogue on the progression to next-generation technologies in the broadband ecosystem and the telecommunications industry.

TechAmerica believes the Commission has been presented with a golden opportunity to effect real change in telecommunications policy. The petitions offered by AT&T and NTCA are important first steps in the journey and are by no means the final and only options offered, but provide the Commission with valuable food for thought. TechAmerica looks forward to the Commission's thoughtful review of the comments filed in this proceeding and welcomes the opportunity to engage the Commission further in this regard.

Thank you for your time and attention to this very important matter.

Sincerely,

Christopher Wilson Vice President and Counsel, Communications, Privacy, and Internet Policy TechAmerica